REMARKS

By this Reply, claims 1-3, 6, 7, 10-14, and 16 have been amended, claims 4, 5, 8, 9, 15, and 17-20 have been canceled without prejudice or disclaimer of the subject matter contained therein, and new claims 21-29 have been added. Accordingly, claims 1-3, 6, 7, 10-14, 16, and 21-29 are currently pending in this application. The new and amended claims are fully supported by the application as originally filed, and thus no new matter has been introduced by this Reply.

In the Office Action mailed March 23, 2010, the specification was objected to; claims 1-12, 19, and 20 were objected to; and claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Rakesh Mohan et al., "FlexFlow: Workflow for Interactive Internet Applications" ("*Mohan*") in view of U.S. Patent No. 6,467,078 to Matsuba et al. ("*Matsuba*").

I.   Objection to the Specification

The specification has been objected to for including "said" and "comprising" in the Abstract. (Office Action, p. 2, ll. 3-5.) A Replacement Abstract has been attached to remove "said" and "comprising." Accordingly, Applicant respectfully requests that the Replacement Abstract be entered and that the objection to the specification be withdrawn.

II.   Objection to the Claims

Claims 1-12, 19, and 20 were objected to for not separating the elements by line indentations under 37 C.F.R. § 1.75(i). (Office Action, p. 2, ll. 7-9.) Claim 1 has been

amended to include line indentations. Accordingly, Applicant respectfully requests that

the objection to the claims be withdrawn.

III.   35 U.S.C. § 103(a) Rejection

Applicant respectfully traverses the rejections of claims 1-3, 6, 7, 10-14, and 16

under 35 U.S.C. § 103(a) as being unpatentable over *Mohan* in view of *Matsuba*.

A.   The cited references do not disclose or suggest a processing member "configured to monitor an actual state of said object . . . [and] determine a position within the matrix of said diagram corresponding to said actual state and said determined event."

Independent claim 1 recites a device operating as a finite state machine and

provided for processing events and actions relating to at least one object that changes

between an initial and a final state. The device includes, among other things:

> a state engine editor . . . configured to:
>
>> form at least one event-state-action diagram defining the finite state machine, the at least one diagram being structured as a matrix of said states of said first set and said events of said second set in order to create at least one state-event combination in at least one position within said matrix, and
>>
>> associate at least one of said actions of said third set to the at least one state-event combination; . . . [and]
>
> a processing member connected to the memory, said processing member having an input and being configured to:
>
>> receive at least one event-message via the input of the processing member;
>>
>> determine which of the events of the second set is associated with the at least one received event-message,

monitor an actual state of said object, the actual state
being associated with one of the states of the first set,

determine a position within the matrix of said diagram
corresponding to said actual state and said
determined event, and

determine at least one action associated with the
determined position.

The cited references do not disclose or suggest a processing member
"configured to monitor an actual state of said object . . . [and] determine a position within
the matrix of said diagram corresponding to said actual state and said determined
event," as recited in independent claim 1.

Mohan discloses using state diagrams for modeling e-commerce business
processes, and the state diagrams indicate states, transitions, actions, and events.
(*Mohan*, § 3, first and second paragraphs, and Figures 2 and 3.) *Mohan* also discloses
a FlexFlow engine that "receives targeted events from the event handler and executes
the necessary actions." (*Mohan*, § 4.3, first paragraph.)

Although *Mohan* discloses state diagrams as shown in Figures 2 and 3, *Mohan*
does not disclose or suggest that the state diagrams are "structured as a matrix of said
states of said first set and said events of said second set in order to create at least one
state-event combination in at least one position within said matrix," as recited in
independent claim 1. The Office Action contends that *Matsuba* discloses this element
and that "it would have been obvious . . . to combine the teachings of Mohan and
Matsuba because Matsuba allows the system to handle real time event transitions."
(Office Action, p. 4, ll. 12-16, and p. 5, l. 20 to p. 6, l. 2.)

Matsuba discloses a control system for a prepaid card selling machine with a state transition matrix for operating the machine. (*Matsuba*, col. 9, ll. 1-13; col. 10, ll. 1-7; and Fig. 3.) The state transition matrix, as shown in Fig. 3, indicates various States 1-4 and Events 1-7. (*Matsuba*, col. 11, ll. 12-58.) *Matsuba* states that each cell indicates a "state subsequent to transition." (*Matsuba*, col. 16, ll. 47-53.) For example, after reading cell (1, 2), which indicates that the state subsequent is State 2, "the State 2 information is stored in the state transition matrix storing section 13." (*Matsuba*, col. 16, ll. 47-53.) Then, *Matsuba* states that, after Event 3 occurs, "because the state subsequent to transition resulting from the previous simulation is the State 2, the cell (2, 3) is decided." (*Matsuba*, col. 17, ll. 1-4.) Therefore, *Matsuba* does not disclose or suggest monitoring an <u>actual</u> state of the machine. Rather, *Matsuba* discloses determining the state based on information stored in the state transition matrix. Since *Matsuba* does not disclose or suggest monitoring an actual state of the machine, *Matsuba* also does not disclose or suggest determining a position within the matrix corresponding to the actual state and a determined event. Accordingly, the cited references do not disclose or suggest a processing member "configured to monitor an actual state of said object . . . [and] determine a position within the matrix of said diagram corresponding to said actual state and said determined event," as recited in independent claim 1.

A possible advantage to providing this feature is described in Applicant's specification. According to an exemplary embodiment, "the state engine [may] respond[] to the same event differently based on the actual state of the package." (Applicant's specification, p. 13, third paragraph.)

Independent claim 13, although of different scope, was rejected in view of *Mohan* and *Matsuba* based on similar reasoning as discussed above in connection with independent claim 1. Thus, for at least similar reasons to those discussed above with regard to claim 1, claim 13 is also patentable over *Mohan* and *Matsuba*.

Claims 2, 3, 6, 7, 10-12, 14, and 16 are also patentable over the cited references at least due to their dependence from one of independent claims 1 and 13.

IV. New Claims 21-29

Applicant also submits that new claims 21-29 are in condition for allowance. New independent claim 22, although of different scope, includes one or more elements that are similar to those of independent claim 1 discussed above that are not disclosed or suggested by the cited references. Thus, for at least the same reasons discussed above with regard to claim 1, claim 22 is also patentable over the cited references. New claims 21 and 23-29 are allowable at least due to their dependency on one of independent claims 1 and 22.

V. Conclusion

Applicant respectfully submits that the pending claims are in condition for allowance.

The Office Action contains characterizations of the claims and the related art with which Applicant does not necessarily agree. Unless expressly noted otherwise, Applicant declines to subscribe to any statement or characterization in the Office Action.

In discussing the specification, claims, and drawings in this Reply, it is to be understood that Applicant is in no way intending to limit the scope of the claims to an exemplary embodiment described in the specification or abstract and/or shown in the drawings. Rather, Applicant is entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

In view of the foregoing remarks, Applicant submits that this claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the reconsideration and reexamination of the application, and the timely allowance of the pending claims.
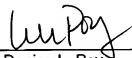
If the Examiner believes a telephone conversation might advance prosecution, the Examiner is invited to call Applicant's undersigned representative at 202-408-4129.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: June 23, 2010   By: _____
                                             Denise L. Poy
                                             Reg. No. 53,480

Attachments: **Replacement Abstract**